

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:	:	
Ardena Y. Starks	:	Chapter 13
	:	No.: 20-13580-ELF
Debtor(s)	:	

RESPONSE OF DEBTOR TO THE MOTION FOR RELIEF OF AUTOMATIC
STAY FILED BY ALLY FINANCIAL, INC.

Debtor, Ardena Y. Starks, by and through their undersigned Counsel, Brad J. Sadek, in response to the Motion for Relief filed by Ally Financial, Inc. hereby submits the following:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted in part. Debtor admits that some payments were missed and requests Movant to provide full post-petition accounting in order to determine the total amount due to bring the account current.
7. Debtor will provide proof of active Auto Insurance Policy.
8. Debtor opposes the same.
9. Admitted payments were missed. Debtor asks for the chance to catch up.
10. Denied.

WHEREFORE, based on the aforementioned, Movant shall be denied an Order modifying the Automatic Stay under Bankruptcy Code Section 362.

Respectfully submitted,

Dated: May 26, 2021

/s/ Brad J. Sadek, Esq.
Attorney for the Debtor
Sadek & Cooper
1315 Walnut Street, #502
Philadelphia, PA 19107
(215) 545-0008

CERTIFICATE OF SERVICE

I Brad J. Sadek, Esq. certify that on the date indicated below served a true and correct copy of the Debtor's Response to the Motion for Relief from Automatic Stay by electronic or Regular U.S. Mail on all creditors and the following parties:

William C. Miller, Esq.
Chapter 13 Trustee

Regina Cohen
Electronic Notice
Attorney for Movant

Dated: May 26, 2021

/s/Brad J. Sadek, Esq.
Brad J. Sadek, Esq.
Attorney for Debtor
1315 Walnut Street
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